

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Patrick Hageman, et al.,

Civil No. 10-1759 RHK/FLN

Plaintiffs,

v.

PRETRIAL SCHEDULE

Accenture, LLP,

Defendant.

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Pursuant to Rule 16 of the Federal Rules of Civil Procedure and the Local Rules of this Court, and in order to secure the just, speedy, and inexpensive determination of this action, the following schedule shall govern this proceeding. The schedule may be modified only upon formal motion and a showing of good cause as required by Local Rule 16.3.

1. Discovery/Non-Dispositive Motions:

- a. All motions which seek to amend the pleadings or add parties must be served and filed by November 1, 2010. Motion by Plaintiffs to provide notice must be filed and served by December 1, 2010. Motion to add all opt-in Plaintiffs must be filed and served by January 1, 2011.
- b. All discovery shall be commenced in time to be completed by April 1, 2011.
- c. No more than 35 interrogatories, including all discrete subparts, shall be served by any party.
- d. No more than 50 Documents Requests shall be served by any party.
- e. No more than 2 non-expert depositions shall be taken per named and opt-in Plaintiff.
- f. No more than one Rule 35 medical examination

per named or opt-in Plaintiff shall be taken and must be completed on or before April 1, 2011.

- g. All nondispositive motions and supporting documents, including those which relate to discovery, shall be served by July 1, 2011. Nondispositive motions may be scheduled for hearing by calling Cathy Orlando, Calendar Clerk to Magistrate Judge Franklin L. Noel, 612-664-5110. All nondispositive motions shall be scheduled, filed and served in compliance with Local Rules 7.1, 37.1 and 37.2.

2. Expert Disclosure and Discovery:

- a. Disclosure of the identity of expert witnesses under Rule 26(a)(2)(A) shall be made as follows:
  - 1) By all parties on or before May 1, 2011, with respect to initial experts.
  - 2) By all parties on or before June 1, 2011, with respect to rebuttal experts.
- b. Full disclosure of the substance of the testimony to be offered by each expert witness shall be made as follows:
  - 1) By all parties on or before May 1, 2011, with respect to initial expert reports.
  - 2) By all parties on or before June 1, 2011, with respect to rebuttal expert reports.
- c. Each party may depose no more than 3 expert witness on or before July 1, 2011.
- d. Any expert testimony which has not been fully disclosed in accordance with this schedule shall be excluded from evidence at trial.

3. Dispositive Motions:

- a. All dispositive motions shall be filed, briefed, and the hearing thereon completed by September 1, 2011.
- b. Counsel are reminded that they must anticipate the time required for scheduling this hearing by calling Calendar Clerk Deborah Siebrecht at 651-848-1166.
- c. All dispositive motions shall be scheduled, filed and served in compliance with Local Rule 7.1.

4. Trial:

- a. This case shall be ready for trial on and after December 1, 2011, at which time it will be placed on the court's jury trial calendar.

DATED: September 22, 2010.

s/ Franklin L. Noel  
FRANKLIN L. NOEL  
United States Magistrate Judge